

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
KALI KANONGATAA,	:	ECF Case
Plaintiff,	:	
	:	Case No. 1:16-cv-07382 (LAK)
-against-	:	
	:	
AMERICAN BROADCASTING COMPANIES,	:	
INC. AND YAHOO! INC.,	:	
	:	
Defendants.	:	
-----	X	

DECLARATION OF NATHAN SIEGEL

NATHAN SIEGEL declares as follows:

1. I am a partner in the firm of Levine Sullivan Koch & Schulz, LLP, counsel for Defendants American Broadcasting Companies, Inc. and Yahoo! Inc. I submit this declaration in further support of Defendants' Motion to Dismiss. I am familiar with the facts herein and make this declaration from my own personal knowledge. The sole purpose of this Declaration is to provide the Court with copies of materials incorporated by reference in the Complaint.
2. A true and correct copy of the Video referenced at paragraph 8 of the Complaint is attached hereto as Exhibit A.
3. A true and correct copy of plaintiff's Facebook page wherein he published the Video referenced at paragraph 8 of the Complaint is attached hereto as Exhibit B.
4. A true and correct copy of the Good Morning America broadcast referenced at paragraphs 11 and 12 of the Complaint is attached hereto as Exhibit C.
5. A true and correct copy of the Good Morning America broadcast as it appears on the Yahoo.com website referenced at paragraph 14 of the Complaint is attached hereto as Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C. on November 21, 2016


NATHAN SIEGEL

CERTIFICATE OF SERVICE

I, Dana R. Green, hereby certify that on November 21, 2016, I caused true and correct copies of the Declaration of Nathan Siegel, together with Exhibit B, to be served via ECF upon all counsel of record and that I caused true and correct copies of Exhibits A, C, and D, which are audio/visual files that cannot be filed electronically, to be served by Federal Express upon:

Richard Liebowitz
Liebowitz Law Firm, PLLC
11 Sunrise Plaza, Suite 305
Valley Stream, NY 11580
Tel: (516) 233-1660
RL@LiebowitzLawFirm.com

Attorney for Plaintiff



Dana R. Green

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
KALI KANONGATAA,	:	ECF Case
Plaintiff,	:	
	:	Case No. 1:16-cv-07382 (LAK)
-against-	:	
	:	
AMERICAN BROADCASTING COMPANIES,	:	
INC. AND YAHOO! INC.,	:	
	:	
Defendants.	:	
-----	X	

INDEX OF EXHIBITS TO THE DECLARATION OF NATHAN SIEGEL

EXHIBIT	DESCRIPTION
A	A true and correct copy of the May 16, 2016 Video posted by Plaintiff to Facebook.
B	A true and correct copy of Plaintiff's Facebook page.
C	A true and correct copy of the May 17, 2016 Good Morning America Broadcast as it appears on the ABC website.
D	A true and correct copy of the May 17, 2016 Good Morning America Broadcast as it appears on the Yahoo.com website.